

Exhibit 2

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

In re Nissan North America, Inc. Litigation

Case No. 3:19-00843

District Judge William L. Campbell, Jr.

Magistrate Judge Chip Frensley

**DEFENDANT NISSAN MOTOR CO., LTD.'S OBJECTIONS AND RESPONSES TO
PLAINTIFFS' FIRST SET OF INTERROGATORIES**

Pursuant to Federal Rule of Civil Procedure 33, Defendant Nissan Motor Co., Ltd. ("NML") submits its Objections and Responses to Plaintiffs' First Set of Interrogatories ("Interrogatories") as follows:

PRELIMINARY STATEMENT AND OBJECTIONS

1. In responding to these Interrogatories, NML has considered Plaintiffs' definitions solely for the purpose of trying to understand what Plaintiffs are asking about. NML does not necessarily agree that the definitions are accurate or useful for any other purpose. In responding to these Interrogatories, NML is not agreeing with or adopting the definitions regardless of whether it has made additional specific objections to each of the definitions or individual requests.

2. NML objects generally to these Interrogatories to the extent they request information related to vehicles beyond 2017-2018 Nissan Rogue, 2017-2018 Nissan Rogue Sport, and 2018 Nissan Murano, on the grounds that such discovery requests seek information that is not relevant to the claims in this action, and is not proportional to the needs of the case.

3. NML objects to Plaintiffs' instructions to the extent they seek to impose obligations beyond the requirements of the Federal Rules of Civil Procedure, the Local Rules of

INTERROGATORY NO. 3:

Identify all present or former employees of Nissan and/or its corporate affiliates who participated in determining what corrective action, if any, would be taken in response to reports of the alleged AEB/FEB Defect in the AEB-Equipped Vehicles.

RESPONSE TO INTERROGATORY NO. 3:

NML objects to this Interrogatory because it is vague, ambiguous, and appears to cover a broad and complex subject. Therefore, it is overbroad, burdensome, and oppressive. NML further objects to this Interrogatory as vague, ambiguous, overbroad, and burdensome in its reference to “corporate affiliates.” Additionally, NML objects to this Interrogatory, which seeks information related to the “AEB/FEB Defect,” because it is argumentative, vague, and assumes a premise that is disputed. NML further objects to this Interrogatory as vague, ambiguous, overbroad, and burdensome to the extent it asks to identify “all” employees.

Subject to and without waiving its objections:

Please see Nissan North America, Inc.’s (“NNA”) response to this Interrogatory.

INTERROGATORY NO. 4:

Identify all persons who wrote, prepared, compiled and/or maintained any studies, analyses, memoranda and/or databases relating to the alleged AEB/FEB Defect in vehicles equipped with an ISST/AEB/FEB or similar Forward Collision Avoidance System (whether or not such vehicles were manufactured or marketed by Nissan), for or on behalf of a Nissan.

RESPONSE TO INTERROGATORY NO. 4:

NML objects to this Interrogatory because it is vague, ambiguous, and appears to cover a broad and complex subject. Therefore, it is overbroad, burdensome, and oppressive. NML objects to this Interrogatory, which seeks information related to the “AEB/FEB Defect,” because it is

argumentative, vague, and assumes a premise that is disputed. NML further objects to this Interrogatory on the grounds that it is vague and ambiguous in the use of the phrases “compiled and/or maintained any studies, analyses, memoranda and/or databases” and “a Nissan.” NML further objects to this Interrogatory as vague, ambiguous, overbroad, and burdensome to the extent it asks to identify “all” persons.

Subject to and without waiving its objections:

At this time, the case is in its early stages and various motions challenging Plaintiffs’ pleadings are pending. Further, NML’s investigation into facts relevant to this case is ongoing. Depending on the ultimate issues deemed relevant to this case, there could be various NML employees with knowledge about issues involved in this case.

To the extent this interrogatory is asking about the groups with design and testing responsibility, the AD/ADAS Advanced Technology Engineering Department (XE0) had design and development responsibility for new Automatic Emergency Braking/Forward Emergency Braking systems, such as the one in the U.S. bound 2017-2018 Nissan Rogue and 2017-2018 Nissan Rogue Sport, up through start of production. The AD/ADAS Engineering Department (XF0) is responsible for application engineering for Automatic Emergency Braking/Forward Emergency Braking systems that have been developed by the Advanced Technology Engineering Department. The AD and ADAS Performance Test Group (XR3) performed vehicle level testing of the Automatic Emergency Braking/Forward Emergency Braking systems.

INTERROGATORY NO. 5:

Identify all persons employed by Nissan and/or its corporate affiliates who were, during the period commencing January 1, 2008, to the present, responsible for receiving, recording and/or responding to consumer complaints, dealer contacts, customer hotline complaints,